

UNITED STATES DISTRICT COURT

for the
District of Oregon

FILED 08 MAR '18 12:21 USDC-ORP

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Bank of America Safe Deposit Box 1130
located at 3967 NE Sandy Blvd, Portland, OR 97232
As described in attachment A

Case No.

'18 -MC-185

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Bank of America Safe Deposit Box 1130, located at 3967 NE Sandy Blvd, Portland, OR 97232
As described in attachment A

located in the _____ District of _____ Oregon _____, there is now concealed (identify the person or describe the property to be seized):

The information and items set forth in Attachment B hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

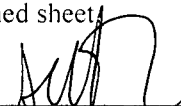
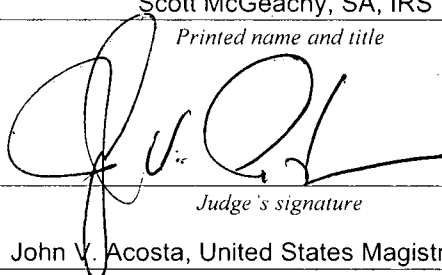
The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. §§ 1956, 1957	Money Laundering and Structuring.
31 U.S.C. § 5324	

The application is based on these facts:
See affidavit which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date: March 8, 2018City and state: Portland, Oregon

Applicant's signature
Scott McGeachy, SA, IRS
Printed name and title

Judge's signature
John V. Acosta, United States Magistrate Judge
Printed name and title

Attachment A
Premises to be Searched

Attachment A – Bank of America Safe Deposit Box 1130 located at 3967 NE Sandy Blvd, Portland, OR 97232

ATTACHMENT B**ITEMS SUBJECT TO SEARCH AND SEIZURE**

The items that are the subject of the search and seizure applied for in this affidavit are as receipt of income and expenses, cash, jewelry, valuables, vehicle purchase records by Johnell CLEVELAND, Minyana Bishop, Cash or Collateral Entertainment and The Dirty TaeToe, LLC which will be found in the location set forth in Attachment A which constitute evidence, contraband and instrumentalities related to violations of federal offenses related to drug trafficking in violation of 21 U.S.C. §§ 841(a)(1) and 846 and instrumentalities of money laundering violations of 18 U.S.C. § 1956, conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h).

1. Financial profits, proceeds and instrumentalities of trafficking narcotics, prostitution proceeds and money laundering, including U.S Currency;
2. Books, records, receipts, notes, ledgers, and other documents relating to financial transaction, communications between members of the conspiracy, and evidence of the use of businesses to disguise profits;
3. Financial records and personal objects relating to money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, checkbooks, title files, vehicle purchases and check registers, as well as precious metals/jewelry such as gold, silver, diamonds, watches, earrings, necklaces, that constitute proceeds of drug trafficking, money laundering or other crimes set forth above.

ss. AFFIDAVIT OF SCOTT MCGEACHY

I, Scott McGeachy, being first duly sworn, depose and say:

BACKGROUND OF AFFIANT

1. I am an Internal Revenue Service (IRS), Criminal Investigation, Special Agent and have been for sixteen years. I completed the eleven-week Criminal Investigator Training Course at the Federal Law Enforcement Training Center, and the sixteen-week Special Agent Basic Training course for the Internal Revenue Service. As a Special Agent, I have been involved in investigations concerning Title 26 (Income Tax), Title 18 (Conspiracy and Money Laundering), Title 21 (Controlled Substances), and Title 31 (Bank Secrecy Act) violations.

2. I have written or been directly involved in writing over one hundred fifty search and seizure warrants. I have participated in the execution of numerous federal search warrants involving criminal income tax charges, money laundering, narcotics violations, and other criminal activities during which evidence of criminal violations was seized. For the past ten years I have predominantly worked investigations involving narcotics trafficking and money laundering.

PURPOSE OF APPLICATION

3. This Affidavit is being submitted in support of an application for a warrant to search:

a. Bank of America Safe Deposit Box 1130 located at 3967 NE Sandy Blvd,
Portland, OR 97232 (hereinafter, “**B of A Safe Deposit Box 1130**”),
as more specifically described in Attachments A, for evidence, fruits and instrumentalities of:
drug trafficking and money laundering in violation of 21 U.S.C. §§ 841(a)(1) and 846;
instrumentalities of money laundering violations of 18 U.S.C. § 1956; conspiracy to commit

money laundering in violation of 18 U.S.C. § 1956(h), as those items are set forth in Attachment B.

4. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, search warrant information, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

INVESTIGATIVE OVERVIEW

5. On March 1, 2018, the Honorable United States Magistrate John V. Acosta in the District of Oregon, signed a search warrant authorizing law enforcement to search the residence of Johnell CLEVELAND and a safe deposit box, which that affidavit is attached to and incorporated by reference herein. On March 5, 2018, the Honorable United States Magistrate Judge John V. Acosta in the District of Oregon, signed a search warrant authorizing law enforcement to search the storage unit held in the name of Minyana Bishop.

6. On March 7, 2018, members of Federal Bureau of Investigation, Drug Enforcement Agency, Portland Police Bureau and IRS Criminal Investigation executed search warrants at the residence of Johnell CLEVELAND and a storage unit held in the name of Minyana Bishop.

7. Law enforcement seized (7) firearms from the residence of CLEVELAND including body armor, jewelry estimated to be worth thousands of dollars, safe deposit box keys for box 1130 and a 2012 Mercedes Benz E350 believed to have been involved in a shooting on

December 23, 2017. Law enforcement seized bulk cash from inside a safe at the storage unit (the cash has yet to be counted). Law enforcement also executed a search warrant at an apartment in Vancouver, WA that CLEVELAND frequented almost on a daily basis. Officers/agents seized what was estimated to be over 200 suspected oxycodone pills, scales and drug packaging material. Tinisha White refused to answer the apartment door during the execution of the search warrant and attempted to flush the oxycodone down the toilet.

8. Surveillance identified that on March 6, 2018, CLEVELAND closed his bank accounts and safe deposit box at U.S. Bank. Geo-location on CLEVELAND's cellular telephone identified that CLEVELAND spent the afternoon at Bank of America located at 3967 NE Sandy Blvd, Portland, OR 97232, which law enforcement believed CLEVELAND to have transferred his bank accounts and safe deposit box from U.S. Bank to Bank of America.

9. On March 7, 2018, during the execution of the search warrant law enforcement seized Bank of America paperwork from the CLEVELAND residence, which corroborated that on March 6, 2018, CLEVELAND opened up a safe deposit box 1130 at the Bank of America branch.

10. I know that bulk cash was stored inside the safe in a storage unit in Clackamas, OR. Furthermore, I know an estimated 200 oxycodone pills were seized from the apartment of Tinisha White along with two firearms. I know drug traffickers store valuables including jewelry and cash inside safes and/or safe deposit boxes. In fact, CLEVELAND stored bulk cash inside a safe that was in a storage unit.

CONCLUSION

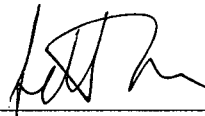
11. Based on the forgoing facts and circumstances, as well as my training and experience and the experience of other officers/agents, I believe there is probable cause that

evidence, contraband, fruits, instrumentalities and proceeds of drug trafficking and money laundering will be found inside Bank of America Safe Deposit Box 1130 located at 3967 NE Sandy Blvd, Portland, OR. I know Johnell CLEVELAND is the listed name on the account. The offenses include, as more specifically described in Attachment B as drug trafficking and money laundering in violation of 21 U.S.C. §§ 841(a)(1) and 846 and instrumentalities of money laundering violations of 18 U.S.C. § 1956, conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h).

12. This affidavit has been reviewed by Assistant United States Attorney Benjamin Tolkoff, who has advised me that, in his opinion, there is probable cause to search the **Bank of America Safe Deposit Box 1130** located at 3967 NE Sandy Blvd, Portland, OR.

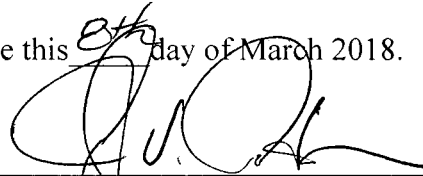
REQUEST TO SEAL

13. To avoid any premature disclosure of the existence of the above-described investigation to anyone who may generally view the public files of the clerk's office, with the result and risk that the investigation may be compromised, I request that the affidavit and order authorizing the searches, be sealed until further order of this Court.



Special Agent Scott McGeachy
Internal Revenue Service

SUBSCRIBED and SWORN to before me this 8th day of March 2018.



THE HONORABLE JOHN V. ACOSTA
UNITED STATES MAGISTRATE JUDGE